Phase II Research

A crucial part of Phase II was the funding, development, and implementation of a detailed quantitative telephone and mail survey to assess consumers' comprehension, attitudes, behavior, and satisfaction with labeling, and to evaluate alternatives. CLI Partners funded and directed the quantitative research, with input from all CLI participants. An independent market research and polling firm conducted the survey. The study included consumers from many demographic segments of the U.S. population, including low-income, low-education, and minority representation. The survey included questions about locating label information, how well consumers understand the information, when and where they consult the labels, the relative importance of different kinds of label information, and which information they wish to be able to find most quickly and easily.

The quantitative survey was designed to address six learning objectives that were identified as a result of the CLI Phase I research. The learning objectives aimed to determine the following:

- # determine the current situation relative to consumers' satisfaction with the format and content of existing labels;
- # determine consumers' hierarchy of importance of basic label information;
- # determine where on the label consumers expect to find particular information, such as First Aid and ingredients;
- # determine consumers' current comprehension of label language;
- # determine whether or not a preference exists for non-FIFRA over FIFRA labels (for household cleaner category only); and
- # determine consumers' reaction to standardized safe use, environmental, health and safety information.

These learning objectives were intended to focus the Phase II research on specific issues related to improving labels. Each objective was intended to generate research findings that would enable the EPA and CLI Stakeholders to take immediate and near-term steps to improve labels. Some changes, such as revised guidance and regulations, are almost entirely under the purview of EPA. Others, such as consumer education, involve many Stakeholders and require a longer time frame. Most important was the willingness of industry Partners owning significant market share of products in the three categories to make label changes based on this process.

These learning objectives and the results of the quantitative research were expected to lead to certain actionable steps that the EPA and its CLI Partners could implement, such as these:

- # quantify key learnings from the qualitative research in Phase I of CLI;
- # collect data that will serve as input into additional qualitative and quantitative research, such as consumer evaluation of potential new label formats;

- # benchmark current consumer practices and preferences, so that changes in behavior/preference (based on label changes and on consumer education activities) can be assessed;
- # provide information that will allow the EPA and its Partners to consider policy implications and to take some immediate action steps;
- # guide the Consumer Education Subgroups's efforts;
- # guide the Storage and Disposal Subgroup in making recommendations; and
- # provide information for potential changes to label language and formats.

In addition to the quantitative research, qualitative research in the form of small ("mini") focus groups was conducted with consumers in three U.S. cities during the Summer of 1998. These groups were intended to elicit in-depth, qualitative information on a number of topics related to the quantitative research surveys. The qualitative research was funded by EPA.

The key learning objectives for the qualitative research, were to determine the following:

- # Consumer *preference* for a specific format for the presentation of standardized information.
- # Consumer *understanding* of the same information presented in different formats.
- # Consumer *preference* for which information should be presented in box(es) or other standardized formats of information groups together.
- # Consumer *preference* for where particular groupings of information should be located on the product label.
- # Consumer *understanding* of the existence of a hazard hierarchy in the signal words CAUTION, WARNING, DANGER, when conveyed graphically, and of the point in the hierarchy on which a given product falls.
- # Consumer *preference* for a particular graphical representation of the CAUTION, WARNING, DANGER hierarchy and product status information.
- # Consumer *understanding* of the association between the product ingredients, the hazard(s), and the relative hierarchy.